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CLERK  
U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Valerie Steiner Plaintiff(s),  
vs.

Case No. 23cv249 WMW/DB  
(To be assigned by Clerk of District Court)

MRS Hddings  
Mark Kelash  
Sam Kelash

DEMAND FOR JURY TRIAL

YES ☐ NO ☒

Defendant(s).

(Enter the full name(s) of ALL defendants in  
this lawsuit. Please attach additional sheets  
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff Valerie Steiner

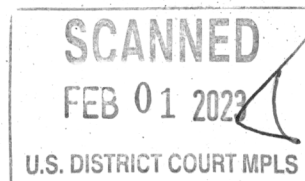
Name Valerusteener

Street Address P.O. Box 17370 lot 5074

County, City

State & Zip Code MN St. Paul MN 55117

Telephone Number 320-247-3362



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 MRS Holdings

Name Sam Kelash

Street Address 1020 1st St S Apt #6

County, City Benton Sauk Rapids

State & Zip Code MN 56379

b. Defendant No. 2 mark Kelash - MRS Holdings

Name mark Kelash

Street Address 233 34th Ave S

County, City Waite Park

State & Zip Code MN 56387

c. Defendant No. 3

Name

Street Address

County, City

State & Zip Code

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

**Check here if additional sheets of paper are attached:** ☐

**Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)**

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal Question      ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:      State of Citizenship:

Defendant No. 1:      State of Citizenship:

Defendant No. 2:      State of Citizenship:

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**

**Check here if additional sheets of paper are attached.** ☐

6. What is the basis for venue in the District of Minnesota? *(check all that apply)*

☒ Defendant(s) reside in Minnesota      ☒ Facts alleged below primarily occurred in Minnesota

☒ Other: explain

OVER 75,000

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered



separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

**Attach additional sheets of paper as necessary.**

**Check here if additional sheets of paper are attached:** ☒

**Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.**

#### REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

my Apartment Back  
\$ 100,000.00 - damages, legal fees



Signed this \_\_\_\_ day of \_\_\_\_\_

Signature of Plaintiff Valerie Steiner

Mailing Address P.O. Box 17370 1015074  
St. Paul, MN 55117

Telephone Number 320 247 3362

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

Save

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Statement of the Claim

Neglect that resulted a Nuisance

7. My lawsuit is for MRS Holdings not providing me a safe environment free of abuse, harassment, threats, violence, damage to personal property and making repairs as needed. Due to MRS Holdings not addressing the issues it created a nuisance. They neglected my complaints and concerns creating a nuisance.

8. November 27, 2021 I had a third complaint for my refrigerator not working properly, December 1, 2021 I was served a notice to quit just days after my third good faith request for repairs. This was direct retaliation.

9. The months of September October and November of 2021 MRS Holdings moved in next door to me. MRS Holdings had a large dog a fully breed Husky. Daily MRS holdings broke the law not using a leash to contain their pet. This resulted in several attacks from the full size husky and my small breed poodle 12-15pds. Confrontation happened each time and I was scared as well as my small dog being aggressively smothered by this large dog. The law states that you have to have your pet in your control at all times. My pet was on a leash every time we were in conflict with the dog. The large dog became tangled in my dogs leash several times. This is the owner of the building, he always said I'm sorry but this lead to a conflict due to their negligence which also resulted in my notice to quit December 1, 2021.

10. I was being harassed by other tenants. My personal property was being vandalized I have police reports, photos, home security video evidence of the vandalizing. I informed MRS Holdings and nothing was done or addressed. I was even served a HRO. I went to court and prevailed the case with evidence showing the other tenant harassing me. I have video and photos from my home security cameras of the harassment including police reports. I informed MRS Holdings and they ignored me complaints creating a further nuisance.

11. In October of 2021 I was harassed by a tenant I immediately contacted the police as I was in fear for my safety. A police report was made I have home video and photos from security cameras for evidence. This was caused by management creating conflict as well as discriminating me by my gender in this situation.



12. I was walking my dog and was physically attacked by a tenant/employee. I immediately called the police and a report was made. I contacted management but nothing was done. They neglected the problem and they just got worse. I couldn't enjoy the environment at my home I no longer stayed home and was often gone to avoid the hostile environment. I started walking my dog across the street at the school parking lot to avoid any contact with this tenant. I also started parking my vehicles at the school parking lot in hopes that the vandalism would stop. Also because the school parking lot had good lighting and I could see anyone that was near my car, boat or truck.

13. Management emailed me and said I couldn't park in the school parking lot. I responded to Management that I had permission from the school to park there because it was not being used due to covid and it also was a public parking lot for the connecting public parks and ball fields.

14. I was stalked from MRS Holdings staff and Management late hours and early morning hours. False accusations false statements that resulted in defamation.

15. MRS Holdings has a duty to perform necessary building repairs. Such as providing me a properly working fridge. Managing tenants and protecting them. Basic tenant rights include the right to a discrimination free zone, Privacy, a habitable home, healthy and safe living environment. Exterminate rodents and other pests. To not punish tenant for using emergency services such as calling the police and other emergency services. A landlord can't evict or penalize a tenant for limit to call the police to a domestic incident or any other situation.

16. MRS Holdings has not followed the law and I have suffered legal fees my reputation, lost employment, a notice to quit that rendered me homeless for months. This was the final result from neglecting complaints that turned into a nuisance and I suffered several damages.

#### Request for Relief

A unit to live in discrimination and a retaliation free zone  
Moving fees, storage fees, hotel fees, punitive damages for emotional suffering, loss of sleep, anxiety, and depression from being homeless and feeling hopeless and helpless, lost my family my daughter and our family pet. The damage to my property from the unlawful retaliation eviction, damaged boat cover, broken and damaged items due to the eviction in the



coldest month of winter. Being rendered homeless. I had  
nowhere to go. Legal fees, filing, paper, stamps, research, Filing a  
appeal I won the appeal it was reversed and remanded to the  
district court.

In the amount of 100 thousand dollars

And anything else the court finds fit.

Valerie Steiner *120 se*

P.O. Box 17370 lot 5074

St. Paul, MN 55117

Steinval8@aol.com

320/247/3362

*Valerie Steiner*

*12-30-2022*